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15 IN THE UNITED STATES DISTRICT COURT
16 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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20 **GRACE SMITH and RUSSELL
21 RAWLINGS, on behalf of themselves and
22 all others similarly situated, and
23 CALIFORNIA FOUNDATION FOR
24 INDEPENDENT LIVING CENTERS, a
California nonprofit corporation,**

Plaintiffs,

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20 v.
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25 **MARY WATANABE, in her capacity as
26 Director of the California Department of
27 Managed Health Care; CALIFORNIA
28 DEPARTMENT OF MANAGED HEALTH
CARE; and KAISER FOUNDATION
HEALTH PLAN, INC.,**

Defendants.

4:21-cv-07872-HSG

STIPULATED REQUEST FOR ORDER
TO EXTEND TIME FOR INITIAL CASE
MANAGEMENT CONFERENCE AND
ASSOCIATED DEADLINES;
[PROPOSED] ORDER

Judge: The Honorable Haywood S.
Gilliam, Jr.

Action Filed: October 7, 2021

JOINT STIPULATION

Plaintiffs Grace Smith, Russell Rawlings, and the California Foundation For Independent Living Centers (“Plaintiffs”), Defendants Mary Watanabe and the California Department of Managed Health Care, and Defendant Kaiser Foundation Health Plan, Inc. (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and agree as follows:

1. WHEREAS, Plaintiffs filed the Class Action Complaint on October 7, 2021;

2. WHEREAS, the initial Case Management Conference was set for January 11, 2021;

3. WHEREAS, Plaintiffs filed a First Amended Class Action Complaint on November 19, 2021;

4. WHEREAS, Defendants requested, and Plaintiffs agreed, that Defendants' deadline to respond to the First Amended Complaint will be extended to January 21, 2022.

5. WHEREAS, on November 29, 2021, the Parties filed a Stipulation For Extension of Time to File Response to First Amended Complaint (Dkt. 18);

6. WHEREAS, the Parties require additional time to satisfy their obligations to meet and confer pursuant to Fed. R. Civ. P. 26(f);

7. THEREFORE, pursuant to Local Rules 6-1(b), 6-2, 7-12, and 16-2(d), it is hereby stipulated between the Parties, through their respective counsel of record, that the initial Case Management Conference currently set for January 11, 2022 be continued to Tuesday, February 22, 2022 at 2:00 p.m. with all associated deadlines moved accordingly.

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1 Dated: December 17, 2021

/s/ Hadara R. Stanton
HADARA R. STANTON
Deputy Attorney General
JENNIFER G. PERKELL
Supervising Deputy Attorney General
Attorneys for Defendants California
Department of Managed Health Care &
DMHC Director Watanabe

6 Dated: December 17, 2021

/s/ Moe Keshavarzi
MOE KESHAVARZI
JOHN BROOKS
A. ALEXANDER KULJIS
Attorneys for Defendant Kaiser Foundation
Health Plan, Inc.

10 Dated: December 17, 2021

/s/ Michael S. Nunez
CLAUDIA CENTER
SILVIA YEE
CARLY A. MYERS
ERNEST GALVAN
MICHAEL S. NUNEZ
Attorneys for Plaintiffs

FILER'S ATTESTATION

Pursuant to Civil Local Rule 5-1(h)(3), I, Hadara R. Stanton, attest that each of the other signatories have concurred in the filing of this Stipulated Request for Order to Extend Time for Initial Case Management Conference and Associated Deadlines.

/s/ Hadara R. Stanton

HADARA R. STANTON
Deputy Attorney General

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[PROPOSED] ORDER

Upon stipulation of the parties, and good cause appearing, the Court hereby orders that the Initial Case Management Conference shall be continued to February 22, 2022, and all associated deadlines moved accordingly.

PURSUANT TO STIPULATION, IT IS SO ORDERED

Date: _____

**Honorable Haywood S. Gilliam, Jr.
United States District Judge**